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7 Attorney for Romie Lemon Turner

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ROMIE LEMON TURNER,

14 Defendant.

Case No. 2:16-cr-073-JCM-CWH

15 **STIPULATION TO CONTINUE  
MOTION DEADLINES**  
(Third Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
18 United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Brenda Weksler,  
20 Assistant Federal Public Defender, counsel for Romie Lemon Turner, that the pretrial motions  
21 deadline be vacated and continued for thirty (30) days.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
23 shall have to and including September 1, 2016, to file any and all responsive pleadings.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including September 8, 2016, to file any and all replies to dispositive motions.

26 The Stipulation is entered into for the following reasons:

27 1. The client is in custody and does not oppose the continuance.

2. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to complete necessary research, prepare and submit appropriate pretrial motions.

3. Undersigned defense counsel needs additional time to obtain documentation pertinent to the case.

4. Denial of this request for continuance would deny counsel for the defendant sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of defense, taking into account the exercise of due diligence.

5. This is the third stipulation to continue filed herein.

DATED this 18<sup>th</sup> day of July, 2016.

RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

/s/ Brenda Weksler  
By \_\_\_\_\_

/s/ Phillip N. Smith, Jr.  
By \_\_\_\_\_

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
ROMIE LEMON TURNER,  
Defendant.

Case No. 2:16-cr-073-JCM-CWH

## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The client is in custody and does not oppose the continuance.
2. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to complete necessary research, prepare and submit appropriate pretrial motions.
3. Undersigned defense counsel needs additional time to obtain documentation pertinent to the case.
4. Denial of this request for continuance would deny counsel for the defendant sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of defense, taking into account the exercise of due diligence.
5. This is the third stipulation to continue filed herein.

1                   **CONCLUSIONS OF LAW**

2                   The ends of justice served by granting said continuance outweigh the best interest of the  
3 public since the failure to grant said continuance would be likely to result in a miscarriage of  
4 justice, would deny the parties herein sufficient time and the opportunity within which to be able  
5 to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

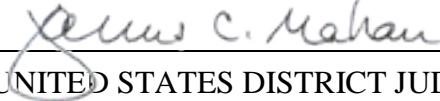
6                   **ORDER**

7                   IT IS THEREFORE ORDERED that the parties herein shall have to and including August  
8 18, 2016, to file any and all pretrial motions and notices of defense.

9                   IT IS FURTHER ORDERED that the parties shall have to and including September 1,  
10 2016 to file any and all responses.

11                  IT IS FURTHER ORDERED that the parties shall have to and including September 8,  
12 2016 to file any and all replies.

13                  DATED July 21, 2016.

14                    
15                  \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE